

THE STATE OF SOUTH CAROLINA  
Public Service Commission

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FORTY LOVE POINT  
HOMEOWNERS' ASSOCIATION

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Docket no. 2018-358-WS  
APPLICATION OF CAROLINA WATER SERVICE, INC. FOR APPROVAL OF  
ANNUAL RATE ADJUSTMENT MECHANISMS AND PETITION FOR  
ACCOUNTING

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**PETITION TO INTERVENE  
AS A PARTY OF RECORD**

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FORTY LOVE POINT HOMEOWNERS' ASSOCIATION, LOCATED NEAR CHAPIN, SOUTH CAROLINA, (a water distribution customer and wastewater removal customer of Carolina Water Service/Blue Granite) moves to join this action as a Party of Record entitled to receive all motions, briefs, all correspondence, and all offers of settlement among the parties.

Forty Love Point HOA opposes this application for the following reasons:

1. **UTILITY RATES WOULD RISE WITHOUT ADEQUATE NOTICE TO CUSTOMERS OR TIME FOR CUSTOMERS TO REACT.** According to the schedule outlined on page 5 of Carolina Water Service's application, customers would be given only a 30-day notice of proposed rate increases, from May 1 to June 1 of each year. Without a public hearing, or further time to comment, customers would be shut out of the decision-making process.

If this proposal were implemented, customers would need to have a forum set up for their comments, either by the Office of Regulatory Staff, the Consumer Advocate's Office, or the Commission itself. Customers would need more time to comment and more time to become aware of proposed rate increases.

2. **THE PROPOSED MECHANISM SEEMS TO BYPASS OR SHORTEN AUDITING BY THE OFFICE OF REGULATORY STAFF.** Customers rely on auditing and review by the South Carolina Office of Regulatory Staff. Allowing the ORS limited time to review and audit the utility's expenses (from March 1 to April 15 of each year) would not work in the customers' best interests.

3. **CUSTOMERS GIVEN FEWER OPPORTUNITIES TO ADDRESS**

**PROBLEMS.** Historically, customers such as Forty Love Point have used rate cases to address serious issues with the water/sewer utility service and infrastructure. For example, when water is unpalatable, or houses are being flooded with sewage backup, customers such as Forty Love Point have used rate cases to address these issues when all other avenues have failed.

An annual rate adjustment mechanism may result in fewer rate cases. While customers would welcome a decrease in legal fees passed on to customers, it would also mean fewer chances to address problems.

Respectfully submitted by,

03/29/2019

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